

Date: November 2nd, 2016

TO: FCC Wireless Amateur Radio Division

RE: Proposed Rule Making RM-11775

While I admit there may be a few isolated abusers of the Amateur radio vanity call sign application process, I am totally opposed to the petitioner's proposal to prohibit vanity call sign holders from applying for a different call sign for the entire 10 year licensing term. 10 years is a very long time. People move, circumstances change, and restricting vanity license holders from updating their call sign for 10 years is unreasonable.

I'm a vanity call sign holder myself, and I have appreciated the opportunity to request a call sign that is more appropriate for my station. My hope is that one day I will be able to obtain a vanity call sign utilizing my initials "DW" from the "9" call area. The proposed rule making would prevent me from applying for that vanity call sign, should it ever become available during the 10 year term of my current license. Renewing my license at the end of the current 10 year term would then lock me out of changing call signs for another 10 year term. I would essentially be locked out forever.

The real solution to this problem is to eliminate, or dramatically reduce, the waiting time for canceled or expired call signs to be reentered into the pool of available call signs. The current 2-year waiting time is what creates the opportunity for the individuals that the petitioner referred to, to remove an excessive number of call signs from the pool, making them unavailable for 2 full years. Reducing the waiting time from 2 years to something more reasonable, such as 60 days, would make those highly desired vanity call signs available again almost immediately. That would both eliminate the incentive for frequent call sign changers to plug up the process, and would also more quickly return those popular call signs to the available call sign pool.

Dave White
Eau Claire, WI